

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	
	)	DOCKET NO. 3:16CR39-MOC
v.	)	
	)	
GLENN GOOCH	)	

**MOTION FOR MANDATORY VICTIM RESTITUTION**  
**AND FOR A NINETY DAY EXTENSION TO DETERMINE FINAL RESTITUTION**

NOW COMES the United States of America, by and through Jill Westmoreland Rose, United States Attorney for the Western District of North Carolina, who files this Motion for a 90-Day Extension of Time to Determine Final Restitution.

Defendant pleaded guilty to receipt and possession of child pornography, in violation of 18 U.S.C. § 2252A. Defendant's sentencing is set for August 9, 2016.

18 U.S.C. § 2259 provides for mandatory restitution in child pornography cases. Any award of restitution in such case is enforced via 18 U.S.C. § 3664. Subsection (d)(5) of that section allows the court to extend the time for final determination of a victim's losses should those losses not be ascertainable by a date that is 10 days prior to sentencing. The government has received restitution requests from six victims in this case. The government must review these requests in light of the factors outlined by the United States Supreme Court in *United States v. Paroline*, 134 S.Ct. 1710 (2014). Furthermore, the government has discussed these requests for restitution with counsel for Defendant and believes that, with additional time and consultation with the victims, the parties may be able to provide a joint recommendation for restitution to the court.

If the parties are unable to come to an agreement, the government's practice has been to

submit claim “packages” provided to it by victims, through counsel, claiming restitution in criminal child pornography cases. The government intends to submit such materials in the instant matter, if necessary, as well as the government’s position regarding the appropriate restitution amount in this case.

Thus, the United States respectfully requests that this Court grant a 90-day extension of time as provided for by 18 U.S.C. 3664(d)(5) in which to determine the amount of restitution due to the victims in this case. Counsel for Defendant does not object to this motion.

RESPECTFULLY SUBMITTED, this 5<sup>th</sup> day of August, 2016.

JILL WESTMORELAND ROSE  
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CERTIFICATE OF SERVICE

I hereby certify that on this 5<sup>th</sup> day of August, 2016, the foregoing ***Motion for Mandatory Victim Restitution and for a Ninety Day Extension to Determine Final Restitution*** was electronically served upon Defendant at the following addresses:

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